

SAFEGUARDING POLICY

Key information

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Please also see the following relevant policies and University materials:

PREVENT webpage	Whistleblowing Policy
Risk Management Policy and Procedures 2024-2027	DBS/Recruitment Policy
Safeguarding webpage	Data Protection/Information Sharing Policy
Safeguarding procedure	Fitness to Study Procedure
Apprenticeships webpage	Behaviour Procedure
Recruitment of people under 18 Policy	Modern Slavery statement
Children and Young Persons guidance	

Report a safeguarding concern:

Internal and external use: safeguarding@westminster.ac.uk

Internal use: <https://reportandsupport.westminster.ac.uk/>

In an emergency (if someone's life is in danger) please call 999

For student wellbeing concerns contact: student-wellbeing@westminster.ac.uk

For behaviour related matters use: <https://reportandsupport.westminster.ac.uk/>

For PREVENT matters contact: safeguarding@westminster.ac.uk

Document control

Version	Summary of amends	Responsibility
1		

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1. Introduction

- 1.1 The University of Westminster recognises its responsibility for children and vulnerable adults who work, study or are involved in any activities with the University. The University is dedicated to keeping people safe, and this is of paramount importance to its day-to-day activities. This is reflected in the policies, procedures, and practices at the University.
- 1.2 This Policy applies to all colleagues, senior managers, committee members, volunteers, employees of contracted services and partner organisations, students, apprentices and any member of the University's alumni who represent the University in an official capacity. References in this Policy to 'colleagues' or 'students' will be representing these groups.

2. Policy aims

- 2.1 The University of Westminster's Safeguarding Policy sets out the University's approach to its responsibilities to safeguard children, young people and vulnerable adults, and to ensuring:
 - Our processes and procedures support and promote safeguarding
 - Safeguarding and wellbeing are prioritised
 - Assurance is provided to anyone that interacts with the University that it takes reasonable steps to manage safeguarding risks
 - Our colleagues and students understand how to report any concerns
 - Appropriate action is taken when safeguarding issues are raised
 - Information is shared about concerns with agencies who need to know in a timely fashion
 - Relevant legislation is complied with
 - Those with specific responsibilities under the Policy are aware of its contents, their responsibilities and others within the University understand who has those responsibilities
- 2.2 This Policy is informed by legislation and statutory guidance including:
 - Children Act 1989 (as amended 2004)
 - Counter-Terrorism and Security Act 2015
 - Criminal Justice and Court Services Act 2000
 - Data Protection Act 2018
 - Domestic Abuse Act 2021
 - Equality Act 2010
 - Health and Safety at Work Act 1974
 - Human Rights Act 1998
 - Keeping Children Safe in Education 2024
 - Prevent Duty
 - Protecting Vulnerable Adults 2017
 - Protection of Children Act 1998page
 - Protection of Freedoms Act 2012
 - Safeguarding Vulnerable Groups Act 2006
 - Serious Crime Act 2015
 - Sexual Offences Act 2003
 - Working Together to Safeguard Children 2023

3. Responsibilities

3.1 The responsibility for safeguarding lies with each colleague, although some specific safeguarding responsibilities are designated to individuals within the University as follows:

3.1.1 Principal Safeguarding Lead

- 1) Safeguarding learners and holding appropriate status within the University to lead on safeguarding matters
- 2) Providing advice and support to other University colleagues on safeguarding matters
- 3) Taking part in discussions and inter-agency meetings or supporting colleagues to do so
- 4) Contributing to safeguarding assessments
- 5) Managing referrals to external agencies and being a central point of contact on safeguarding matters
- 6) Advising on the University's safeguarding training needs and development of safeguarding strategy
- 7) Supporting on policies and procedures, encouraging the dissemination of such documents
- 8) Part of the University's incident management team
- 9) Providing availability for support during University hours in conjunction with Designated Safeguarding Leads

3.1.2 Designated Safeguarding Leads

- 1) Undertaking a minimum of Level 3 safeguarding training at least every two years and Prevent awareness training
- 2) Working with others within the University to create safer cultures and a positive inclusive environment
- 3) Playing a supportive role in developing and establishing the University's approach to safeguarding all learners and in maintaining and reviewing the University's implementation plan for safeguarding all learners in line with current legislation and best practice
- 4) Supporting the dissemination of the safeguarding policy, procedures and resources throughout the University
- 5) Supporting the review of other policies and procedures to ensure they are consistent with the University's commitment to safeguarding all learners
- 6) Receiving reports of and managing cases reported to the University, including the effective co-ordination of the University case management process
- 7) Managing liaison with, and referrals to, external agencies, for example adult social-care services and the police, etc.
- 8) Escalating cases to the University Risk Panel when there are Prevent/radicalisation concerns
- 9) Being a central point of contact for internal and external individuals and agencies concerned about the safety of students registered with the University

- 10) Representing the University at external meetings related to safeguarding
- 11) Providing availability for support during University hours in conjunction with the Principal Safeguarding Lead
- 12) Keeping records up to date and securely stored

3.1.3 All colleagues

- 1) Undertake mandatory safeguarding training
- 2) Understand how to raise a safeguarding concern
- 3) Raise and record safeguarding concerns quickly and appropriately
- 4) Ensure they understand the Safeguarding Policy and their duties
- 5) Co-operate with third party agencies where required
- 6) Do not promise absolute confidentiality to students or others; instead, ensure that information is handled sensitively and shared only on a need-to-know basis
- 7) Ensure safeguarding is considered in any task or event specific risk assessments, where relevant
- 8) Be prepared to undergo an appropriate Disclosure and Barring Service (DBS) check when requested. The level of DBS check required (Basic, Standard, or Enhanced) will depend on the nature of the role and the extent of contact with children, young people, or vulnerable adults.

3.1.4 All students

- 1) Report any concerns about fellow learners or individuals they interact with as part of University activities and business

3.2 The University shall maintain safeguarding standards to meet its legislative obligations to safeguard children, young people and vulnerable adults in contact with the University, however for children (anyone under the age of 18), safeguarding and wellbeing remains the primary responsibility of the parent, guardian or carer of the child. Please see the University of Westminster [Children and Young Persons guidance](#).

4. What is safeguarding?

4.1 Safeguarding is an overarching term used to describe the protection of the health, wellbeing, and human rights of individuals. This can include vulnerable adults and children. In relation to adults, safeguarding measures should seek to:

- protect the rights of adults to live in safety, free from abuse and neglect
- ensure people and organisations work together to prevent and stop both the risks and experience of abuse or neglect
- ensure people and organisations promote adult wellbeing including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action
- recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances and therefore potential risks to their safety or wellbeing

4.2 Safeguarding is not the concern of one individual or one stakeholder; it is the responsibility of all.

5. Who does safeguarding apply to?

- 5.1 Safeguarding does not just apply to children and young people. Safeguarding duties also extend to vulnerable adults.
- 5.2 A child, for the purposes of this Policy and legislation, is anyone under the age of 18 as defined in the Children Act 1989.
- 5.3 For the purposes of this Policy, a vulnerable adult is anyone who may be unable to protect themselves from abuse, harm or exploitation, which may or may not be as a result of illness (including mental illness), age, disability or some other vulnerability.
- 5.4 The circumstances in which an adult can be considered vulnerable vary and are wide ranging, but we have listed some examples (note this is not an exhaustive list):
- A person identified as at risk of radicalisation (Prevent)
 - A person at risk from others (such as their family or partner or spouse) or from abuse or neglect
 - Being in receipt of certain types of medical care
 - Domestic violence, including coercive control
 - Drug or alcohol dependence
 - Forced marriage
 - Harassment or bullying of any nature
 - Homelessness
 - Honour based violence
 - Learning differences such as neurodiversity which is impacting day to day life
 - Mental health is deteriorating, such that the individual is becoming a risk to themselves or a risk to others; or somebody who is at risk from others or from neglect (neglect to self, to dependent, from other people such as carers)
 - Modern slavery and human trafficking
 - Not maintaining physical appearance where physical appearance is noticeably deteriorating for example in relation to personal hygiene, cleanliness of clothing, loss of weight, visible exhaustion
 - Self-harming
 - Social isolation
 - Suicidal ideation, whether or not there appears to be an active plan

6. Activities Where Safeguarding Considerations May Arise

- 6.1 Safeguarding responsibilities apply to all University activities and business. The University's activities and business cover a wide range of circumstances in which University colleagues and students interact with children, young people, and other members of the public. We have listed some examples below to illustrate the range of activities where we may encounter safeguarding concerns. The University of Westminster takes part in many activities where safeguarding matters should be considered, for example:
- Charitable activities
 - Field trips
 - Graduation ceremonies
 - Language services
 - Open days
 - Outreach programmes in the community
 - Photography of children for publication
 - Placements
 - Remote interactions with children in mentoring capacities
 - Residential activities
 - Research and knowledge exchange
 - School and college trips to the University
 - Sports partnerships
 - Summer schools
 - TNE partnership activities

- Under 18s attending as a student
- Working with disabled students

6.2 Safeguarding must be considered in relevant task or event specific risk assessments. Risk assessment is addressed in more detail below at section 7.

7. Risk assessment

- 7.1 University procedures and policies contain relevant information relating to risk assessments.
- 7.2 For event/task specific risk assessments which can potentially involve children or vulnerable adults, it is expected that safeguarding will be considered as part of the event/task risk assessment. Designated Safeguarding Leads can offer support to event organisers.

8. Reporting safeguarding concerns

- 8.1 The University has a Safeguarding Procedure which sets out the steps for the reporting of potential safeguarding concerns from both internal and external parties. The procedure also sets out the steps to take upon receipt of a potential concern.
- 8.2 Reports will be assessed by the Student Wellbeing Service and, in more complex cases, discussed by a multi-disciplinary Coordinated Case Panel.
- 8.3 Onward referral may be made to a number of agencies which may include but is not limited to:
- Local Authority Designated Officer
 - National Health Services (NHS)
 - Police
 - Metropolitan Police Counter Terrorism Command
 - Social Services
 - Specialist support agencies
- 8.4 In some activities involving external organisations, that organisation's safeguarding policy may also need to be followed. This does not negate the requirement to also follow the University's policy and to make reports to the University in the event of a concern, as well as to the external organisation. Where third parties are involved, receipt and understanding of its safeguarding policy when carrying out risk assessments is required.
- 8.5 Records kept on Safeguarding referrals will be confidential to People, Culture and Wellbeing and/ or to the Student Wellbeing Service and Coordinated Casework Panel and shared in line with data protection protocols.
- 8.6 It may be required in specific cases to inform outside agencies. In cases involving adults, initially the individual's consent will be sought, but in cases involving imminent risk to the life of the individual or to another person, referrals will be made without consent.
- 8.7 The safeguarding reporting function is not to be used in emergencies. It should not be used when someone is in imminent danger to themselves or to other people. In these circumstances, emergency services should be called.

9. Apprenticeships and Third Parties

- 9.1 The University of Westminster is a provider of a number of integrated apprenticeships, which involves the

University providing education and degree accreditation, alongside placements and employed work.

- 9.2 The University works closely with employers and placement providers to ensure safeguarding responsibilities and expectations are communicated and actioned.
- 9.3 Partner organisations the University works with are contractually obliged to ensure they conduct their business in line with safeguarding legislation.
- 9.4 The University regularly reminds relevant external organisations of their duties in relation to safeguarding and provides them with University contact details for reporting and escalation. This is provided through training and information. To meet their obligations employers will:
- 1) Familiarise themselves with relevant legislation
 - 2) Take appropriate steps to understand what safeguarding means in practice at their organisation, in the context of the responsibilities they have for the people they employ and interact with
 - 3) Ensure that any colleagues working with apprentices in a position of trust are appropriate for the role
 - 4) If possible, identify a person to coordinate safeguarding across all apprentices
- 9.5 Employers and placement providers are the relevant duty holders for the purpose of workplace safety, welfare, and wellbeing.
- 9.6 In relation to apprenticeships, tripartite progress review meetings take place approximately every 12 weeks. These meetings are an opportunity for liaison between the University, student/apprentice and employer/placement provider, but liaison is not limited to these interactions and is actively encouraged outside of tripartite meetings.

10. Prevent

- 10.1 Section 26 Counter Terrorism and Security Act 2015 places a duty on Higher Education organisations to have regard to the need to prevent people from being drawn into terrorism, which is known as the Prevent duty. Students and others may be at risk of radicalisation, which is to be considered a safeguarding concern and reported in the usual way.
- 10.2 Part of the University's approach to the Prevent duty is in promoting British values which include the rule of law, democracy, individual liberty, mutual respect and tolerance of those from other faiths and beliefs.
- 10.3 The University has resources available relating to its Prevent duties, and more information can be found [here](#).

11. General Data Protection Regulation (GDPR) and Data Protection

- 11.1 The University complies with the Data Protection Act 2018 and GDPR.
- 11.2 Information in relation to safeguarding is shared on a need-to-know basis, based on an assessment of risk. Consent will typically be sought from the individual prior to the sharing of information, but information can be shared without consent when there is a risk-based need to do so. For example, where someone is at imminent risk of harm, it is not expected that consent will be sought from the individual prior to the sharing of information.
- 11.3 Colleagues are informed that confidentiality cannot be promised. Anyone raising a safeguarding concern is made aware the matter can be raised in confidence, but escalation may be required internally at the University and externally with outside agencies.
- 11.4 Information sharing agreements are in place with relevant partner organisations.

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